



County of San Diego

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June 14, 2017

Michele Berlove
Wireless Competition Bureau
Federal Communications Commission
California Department of Transportation
445 12th Street SW
Washington, DC 20554

Electronically filed at: <https://www.fcc.gov/ecfs/>

NOTICE OF INQUIRY FOR ACCELERATING WIRELESS BROADBAND DEPLOYMENT BY REMOVING BARRIERS TO INFRASTRUCTURE INVESTMENT – 17-38 (PROJECT), FEDERAL COMMUNICATIONS COMMISSION (FCC)

Ms. Berlove,

The County of San Diego (County) has reviewed the FCC's Notice of Inquiry for Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment 17-38 (Project). The County appreciates the opportunity to comment on this project, and offers the following comments for your consideration.

PARKS AND RECREATION

1. The FCC is contemplating enacting rules that would restrict and or eliminate the ability of local agencies to enact regulations and/or charge fees for wireless telecommunication facilities. The contemplated rule changes would potentially reduce and/or eliminate the Department of Parks and Recreation's (DPR) revenue from leases on County-owned land, such as parks and preserves. DPR relies upon these revenues to partially fund operation and maintenance of our parks and preserves where the wireless telecommunication facilities are located; and any loss of revenue could potentially result in closing of park amenities or entire parks.
2. DPR objects to any proposed rules that would restrict or eliminate the County's ability to collect leasing fees for wireless telecommunications facilities on County park or preserve lands.

TRANSPORTATION/TRAFFIC

1. The proposed FCC rules could have a significant impact to Public Works' Transportation program.
2. Under existing law, a wireless telecommunications collocation facility, as specified, is subject to a City or County discretionary permit and is required to comply with specified criteria, but a collocation facility, which is the placement or installation of wireless facilities, including antennas and related equipment, on or immediately adjacent to that wireless telecommunications

collocation facilities, is a permitted use not subject to a city or county discretionary permit. This NOI would provide that a small cell is a permitted use, not subject to a city or county discretionary permit, if the small cell meets specified requirements. By imposing new duties on local agencies, this rulemaking would impose a state-mandated local program. The bill would authorize a city or county to require an administrative permit for small cell.

3. The proposed rulemaking could result in a significant loss of control over the County's own facilities (e.g. light poles, signal poles, sign posts) or right-of-way.

The County looks forward to receiving future documents and/or notices related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino at 858-495-5468 or by e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,


N. ALVEY FOR J. FARACE
Joe Farace, Group Program Manager
Advance Planning Division
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E-mail cc:

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